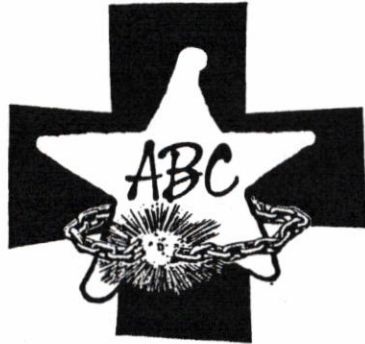


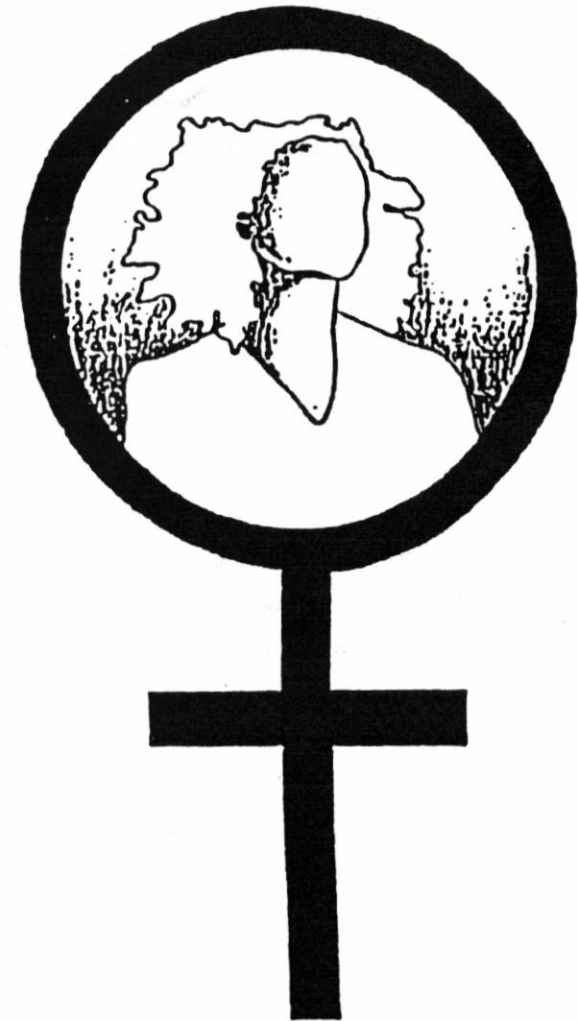
# The Invisibility of Women Prisoners' Activism

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Introduction

Within the scant research published about prisoner activism and instances of resistance, women are nearly invisible. Although women in prison comprise under six percent of the nation's prison population, their numbers are increasing more rapidly than those of their male counterparts: between 1990 and 1998, the rate of female incarceration increased 88%.<sup>1</sup> However, the interest in women prisoners' struggles against the prison-industrial complex remains much lower than that of male prisoners'.

This invisibility is not new. In the early 1970s, recognizing that prisoners are one of the most marginalized and voiceless populations in America, activists expanded their interests to include those of prisoners and their rights: new, critical analyses of prisons emerged, prisoners' rights organizations and unions were created, and there were new communications among prisoners, academics and community activists. During this time, prisoners' writings became required texts in numerous university courses and some universities began teaching courses inside prisons. However, in 1970, researcher and activist Karlene Faith discovered that, to the male inmates of Soledad, "female prisoners were as invisible to them as they were to the broader public." Faith argues that this overlooking of women prisoners occurred because not only were they fewer in number, but "they [also] were not as politicized as the men [prisoners], and they did not engage in the kinds of protest actions that aroused media attention."<sup>2</sup> Women's concerns, if recognized at all by the prisoners' rights movements, were dismissed as personal, self-centered and apolitical. Similarly, it was not that women did not engage in protest actions but that these actions were ignored by outside movements, who chose to focus on the better-known names of male prisoners. Thus, while male prisoners gained political consciousness and enjoyed support from outside groups and individuals, many women in prison were neglected by these same groups. With exceptions of well-known women such as Angela Davis and Assata Shakur, the prisoners' rights movement overlooked the female prison population. These same observations hold true today. Male prisoners

Grievances, Lawsuits and the Power of the Media

<sup>1</sup> "Defend the Lives of Women in Prison." *Prison News Service*, #51. May/June 1995. 2.

<sup>2</sup> Human Rights Watch. 232.

<sup>3</sup> Thaxton, Rob. "Red, White and Blue Fascism." *Chain Reaction* #5. 6-7.

<sup>4</sup> Cook and Parenti. 3.

<sup>5</sup> Heinlein, Gary. "Prison Sex Could Draw Prison Term." *The Detroit News*. 11 October 1999.

<sup>6</sup> Pens. Dan. "Bag'm. Tag'm and Bury'm." 2.

<sup>7</sup> Ibid.

<sup>8</sup> Ibid. 7.

<sup>9</sup> "Sisters Behind Bars: Inside the Women's Prisons of California." Cites *All Too Familiar: Sexual Abuse of Women in U.S. Prisons*. Human Rights Watch Women's Rights Project. December 1996.

<sup>10</sup> *Unruly Women*. 250-251.

<sup>11</sup> Paula Strothers' Regional Administrative Remedy Appeal. 6 November 1997. (Reprinted in "Art From Inside: Out." January 1998. ABC No Rio.)

<sup>12</sup> Human Rights Watch. 256-7.

<sup>13</sup> Ibid. 259.

<sup>14</sup> Amos. Dated 14 May 2001.

<sup>15</sup> Ibid.

<sup>16</sup> Letter from Barrilee Bannister. Dated 21 June 2001.

<sup>17</sup> *The Fire Inside*. #4. May 1997.

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## Sexual Abuse

<sup>1</sup> Human Rights Watch Women's Project. *All Too Familiar: Sexual Abuse of Women in U.S. State Prisons*. Washington, DC: Human Rights Watch, 1996. 236-7. Cites letter from Deval Patrick, assistant attorney general, U.S. Department of Justice, to John Engler, governor, Michigan. 27 March 1995.

<sup>2</sup> Human Rights Watch. 248-9.

<sup>3</sup> Cook, Christopher D. Parenti, Christian. "Rape Camp USA: The Epidemic of Sexual Assault in Women's Prisons." *Disbarred: The Journal of the National Lawyers Guild Prison Law Project*. #16. 1.

<sup>4</sup> This attitude is reflected in the 1977 *Los Angeles County Department of Adoptions vs. Hutchinson* decision. The court terminated a woman's parental rights six months before her release from prison on the flimsy reasoning that she was not going to be released immediately. (See Joycelyn Pollock-Byrne's *Women, Prison, and Crime*. Pacific Grove, CA: Brooks/Cole Publishing Co., 1990. 177. Cites *Los Angeles County Department of Adoptions vs. Hutchinson*. No. 2 Civil 48729.)

<sup>5</sup> Letter from Barrilee Bannister. Dated 21 June 2001.

<sup>6</sup> Ibid.

<sup>7</sup> Thaxton, Rob. "Red, White and Blue Fascism." *Chain Reaction* #5. 6-7

## Education

<sup>1</sup> For a detailed account of the Santa Cruz Women's Prison Project, see Faith's *Unruly Women*.

<sup>2</sup> *Powell v. Ward* affirmed an inmate's right to due process during disciplinary hearings.

<sup>3</sup> Diaz-Cotto. 351-2.

<sup>4</sup> Fine, Michelle. Torre, Maria Elena. "The Impact of College Education on Inmates in the New York State Region." Testimony to the New York State Democratic Task Force on Criminal Justice Reform. Public Hearings. State Office Building. Brooklyn. New York: 4 December 2000. 2.

<sup>5</sup> Ibid. 20.

<sup>6</sup> Letter from Dawn Amos. Dated 7 April 2001.

seldom know about their female counterparts while the broader public, if knowledgeable at all about prison issues, tends to focus on men.<sup>7</sup>

Similar to the resurgence of interest in prisons and prisoner issues which ignores prisoner activism, the new literature on women in prison focuses on the causes, conditions and effects of imprisonment, but does not delve into what the women themselves do to change or protest these circumstances. Faith, who had coordinated the Santa Cruz Women's Prison Project in the 1970s, cites virtually no examples of women's individual or collective acts of resistance in her book *Unruly Women*. In *In the Mix: Struggle and Survival in a Women's Prison*, Professor Barbara Owen admits that she developed a visible rapport with prison staff at the Central California Women's Facility to facilitate her interviews with the inmates. This obvious rapport may have led to a distrust by prisoners engaged in acts of resistance, resulting in either silence about their actions or a total decline to be interviewed. Similarly, prison staff may have steered her away from "problem" inmates so as not to expose any gross violations or abuse occurring within the institution. Even Daniel Burton-Rose's *The Celling of America*, which includes articles of prisoner organizing, omits instances of female resistance, reflecting the continued lack of outside recognition for women prisoners who act as their own agents for social change.

Why the cloak of silence? One more prominent woman prisoner, Barrilee Bannister, offered this explanation: "A lot of women believe themselves to be helpless, due to how they were raised, or perhaps abused as a child. I see a lot of women with very low self-esteem/worth."<sup>4</sup> A study by the U.S. Department of Justice found that over forty-three percent of women prisoners, as opposed to twelve percent of male prisoners, had been physically or sexually abused prior to their admission to prison.<sup>5</sup> It also affirmed that women's earlier socialization "had limited their independence and occupational choices."<sup>6</sup> While this study was not directed towards the lack of activism among women prisoners, its findings did affirm Bannister's observation. While interviewing women inmates for her book *In the Mix*, Owen was told, "it is easier for women to get bullied in here. If an officer raises his or her voice to you, some women are petrified. The fear from past abuse comes back and they are scared. Very scared."<sup>7</sup> A 1999 Department of Justice study confirms these observations, finding that almost half



of women in jails and prisons had been physically or sexually abused prior to their incarceration—a much higher rate than reported for the overall population.<sup>8</sup> Thus, women prisoners have to contend not only with the apathy or inertia of their fellow inmates and the fear of administrative retaliation, but also the issues of past abuse and socialization of obedience and subservience that affect women.

Another explanation might be that women are perceived as passive. Faith counters the argument that women prisoners lack self-esteem as a "blaming or condescending projection by class-biased people who can't imagine that women with so many problems could think well of themselves... Given that most incarcerated women have had to hustle in some way to survive, many of these women might well have a greater sense of their resourcefulness than is the norm among women, even when their means of survival appears self-destructive to others."<sup>9</sup> This perception leads to the dismissal of the notion that women can and do contribute to struggles for change. Just as the civil rights movement of the 1960s and 1970s downplayed the role of women in favor of highlighting male spokesmen and leaders, the prisoners' rights movement focuses on men to speak for the masses. Such neglect leads to the definition of prison issues as masculine and male-dominated, dismissing prison issues which are distinctly feminine (i.e. the scarcity of sanitary hygiene products, the lack of medical care specifically for women, especially prenatal care, threats of sexual abuse by guards, etc.) and thus any actions which women take to address and overcome these concerns. Thus, researchers and scholars do not search out acts of defiance among the growing female prison population.<sup>10</sup> For instance, on 28 August 1974, inmates at Bedford Hills protested the beating of a fellow inmate by holding seven staff members hostage for two-and-a-half hours. However, "the August Rebellion" is virtually unknown today despite the fact that male state troopers and (male) guards from men's prisons were called to suppress the uprising, injuring twenty-five women, that twenty-four women were transferred to Matteawan Complex for the Criminally Insane without the required commitment hearings, and that the story featured in *The New York Times* at least twice.<sup>11</sup> Similarly, women in a California prison held a "Christmas riot" in 1975: Protesting the cancellation of family holiday visits and holiday packages, inmates gathered in the yard, broke windows, made noise and burned Christmas trees in a "solidarity" bonfire. However,

<sup>8</sup> Pollock-Byrne, 173. Cites *Pitt v. Meese*, 684F. Supp. 303 (D.D.C. 1987).

<sup>9</sup> Letter from Barrillee Bannister. Postmarked 26 January 2001.

<sup>10</sup> Letter from Barrillee Bannister. Dated 2 March 2001.

<sup>11</sup> This is not to say that women prisoners do not employ tactics of disruption. In 1971, women at Alderson Prison staged a four-day work stoppage in solidarity with the uprising at Attica. In 1975, inmates at the North Carolina Correctional Center for Women staged a five-day demonstration "against oppressive working atmospheres, inaccessible and inadequate medical facilities and treatment, and many other conditions." (Kushan, Nancy. "Women and Imprisonment in the United States: History and Current Reality." Monkeywrench Press, 25)

<sup>12</sup> Morash et al. 8.

<sup>13</sup> Harris, Jean. *Stranger in Two Worlds*. NY: MacMillan Publishing Company, 1986. 286.

<sup>14</sup> Boudin, Kathy. "The Children's Center Programs of Bedford Hills Correctional Facility" in *Maternal Ties: A Selection of Programs for Female Offenders*. Cynthia L. Blinn, ed. Lanham, MD: American Correctional Association, 1997. 68.

<sup>15</sup> The success of the programs at Bedford Hills is documented by books, articles and manuals written by its inmate participants. Unlike the writings and publications of most prisoner activists, these documents are more widely accepted and acknowledged by general society.

<sup>16</sup> Boudin, 84. Boudouris, 19.

<sup>17</sup> Many of the current studies about parenting and prisons has been directed towards prison administrators. However, one such article about the Children's Center was written by political prisoner Kathy Boudin and published by the American Correctional Association!

<sup>18</sup> The American Correctional Association has published several books on mothers in prison, giving the misleading impression that there are more than enough programs and facilities which encourage family contact.

<sup>19</sup> Diaz-Cotto, 347. Cites anonymous interview, New York City, 15 April 1989.

<sup>20</sup> Ibid. 366-7. Cites anonymous interview, New York City, 22 March 1989.

<sup>21</sup> Human Rights Watch, 298.

<sup>22</sup> Letter from Kathy Warner. Dated 29 April 2001.



<sup>12</sup> The Women of the ACE Program of the Bedford Hills Correctional Facility. *Breaking the Walls of Silence: AIDS and Women in a New York State Maximum-Security Prison*. Woodstock, NY: The Overlook Press, 1998. 23.

<sup>13</sup> ACE. 23-4.

<sup>14</sup> ACE. 41-44.

<sup>15</sup> ACE. 54.

<sup>16</sup> ACE. 66-67.

<sup>17</sup> Resistance in Brooklyn. "Enemies of the State: A frank discussion of past political movements, victories and errors, and the current political climate for revolutionary struggle within the u.s.a. with european-american political prisoners Marilyn Buck, David Gilbert and Laura Whitehorn." 1998. (pamphlet)

<sup>18</sup> *The Fire Inside*. (Newsletter of the California Coalition for Women Prisoners) #1, May 1997.

<sup>19</sup> Pierson, Cassie M. Memorial for Charisse Shumate. First Unitarian Church, San Francisco, California. 23 September 2001.

#### Children

<sup>1</sup> Greenfield and Snell. 8.

<sup>2</sup> Owen. 120. Cites American Correctional Association's "The Female Offender: What Does the Future Hold?" Washington, DC: St. Mary's Press, 1990.

<sup>3</sup> Faith. 204. Cites Serapio R. Zalba's *Women Prisoners and Their Families*. Sacramento: Department of Social Welfare and Corrections, 1964.

<sup>4</sup> Henriques, Zelma Weston. *Imprisoned Mothers and Their Children: A Descriptive And Analytical Study*. Lanham, MD: University Press of America, 1982. 132.

<sup>5</sup> Morash et al. 1.

<sup>6</sup> Human Rights Watch. 18. Cites Barbara Bloom and David Steinhart's *Why Punish the Children? A Reappraisal of the Children of Incarcerated Mothers in America*. San Francisco, CA: National Council on Crime and Delinquency, 1993. Table 2-9.

<sup>7</sup> Ibid. Cites Bloom and Steinhart. Table 2-10.

because no one had threatened violence, this act of disruption is even more easily overlooked by those researching prison disturbances.<sup>12</sup>

Juanita Diaz-Cotto, one of the few scholars to study women prisoners' activism, stated that she was moved to record post-Attica prisoner activism among Latinas in New York State after volunteering at a women's prison: "Just as women in the outside community struggle daily to change conditions we perceive to be oppressive, there have always been groups of women who have organized within prison walls to try to change conditions."<sup>13</sup> However, just as much of the research on women's issues downplayed the role of women themselves in challenging, if not changing, oppressive social policy and practice, most research on women prisoners and their concerns do not share Diaz-Cotto's concern for documenting women as active agents of social change.

Diaz-Cotto argues that social scientists studying women prisoners "highlight the role played by women's prison family groups and kinship networks, almost to the complete exclusion of other types of prisoner organization."<sup>14</sup> The emphasis on prison families not only substitutes for research into inmate resistance but also reinforces the stereotype that women's sole concern is to maintain their traditional gender roles.<sup>15</sup> Similar to the overlooking of prisoner activism in favor of outside prisoner rights' movements, research on women prisoners favors details of prison family and kinship networks over the more painstaking task of searching out and documenting the less visible instances of resistance. This becomes a self-perpetuating cycle: by highlighting the various family and kinship networks to the exclusion of other forms of organization, scholars give the impression that this is the only form of organizing within women's prisons, not only silencing the voice of women prisoner activists but also paving the way for other scholars to do the same.

Bannister also acknowledges that the lack of numbers are also an obstacle to forming a women's movement behind bars. Male prisoners, on the other hand, have more than sufficient numbers to organize inmate-led movements within their facilities. Women prisoners not only lack a visible movement, but they are often neglected by their male counterparts: Despite its large membership, the Missouri Prison Labor Union has



no women inmates as members. Only this past year have its organizers attempted to address them.<sup>16</sup>

Women prisoners also lack a common history of resistance. While male prisoners have the example of George Jackson, the Attica uprising and other well-publicized cases of prisoner activism, women remain unaware of precedents relevant to them. Added to this is the administrative harassment, dissuading possible participants. One woman stated that the level of harassment is "so great that most of your fellow prisoners think that you need be crazy for even attempting to challenge the prison system wrong doings in anyways."<sup>17</sup> Kebby Warner, a prisoner in Michigan, has encountered similar resistance from her fellow inmates: once she started to become aware that her plight was shared with thousands of other women, she tried to organize and educate those around her about the prison-industrial complex: "I was laughed at and they went so far as accusing me of being a Klan member because of the way Amerikkka was spelled in the zines I passed out. They wouldn't even read them."<sup>18</sup>

Women prisoners also face different circumstances during their incarceration and thus have different priorities and different ways of challenging their conditions than their male counterparts.<sup>19</sup> Prevalent ideas of prisoners are masculine: the term "prisoner" usually connotes a young, black man convicted of a violent crime such as rape or murder. Politicians seeking votes and media seeking sales play on this representation, whipping the public into a hysteria to get tougher on crime and build more prisons. However, the image of the young, black male felon omits the growing number of women imprisoned under the various mandatory sentencing laws passed within the past few decades. Because women do not fit the media stereotype, the public chooses to overlook them rather than grapple with the seeming paradoxes inherent in women prisoners, who, by virtue of their incarceration, have somehow defied the societal norm of femininity.<sup>20</sup> This is compounded by the seeming contradiction of prisoners as mothers, as women with reproductive rights (or even the ability to reproduce), and as women in general. Women prisoners and their differing needs and concerns complicate the public perception of prisons and prisoners. However, prison authorities have been slow to recognize these

<sup>16</sup> For more information on prison family groups among women, see Angela Davis's autobiography, Joycelyn Pollock-Byrne's *Women, Prison and Crime*, and Diaz-Cotto. However, according to Diaz-Cotto, the existence of such prison family groups did, in some instances, facilitate inmate organizing: "While individual prisoners might not care much about organizing to reform prison conditions, when requested to do so by other family members, they typed petitions, translated grievances, collected evidence of guard abuses, and passed messages to prisoners in other housing areas." (Diaz-Cotto, 302)

<sup>17</sup> Letter from Jerome White-Bey, dated 4 November 2000.

<sup>18</sup> Letter from Oregon Women's Correctional Center.

<sup>19</sup> Letter from Kebby Warner. Dated 29 April 2001. In many radical and prison abolition writings, especially those found in zines (underground publications), "America" is spelt "Amerikkka" to signify the country's institutional racism.

<sup>20</sup> One issue particular to female inmates is the distribution of sanitary napkins. For instance, in New York State prisons, each inmate is allocated a set number of napkins per year. Because of the scarce supply, many women are forced to reuse and share them. (Human Rights Watch Women's Project. *All Too Familiar: Sexual Abuse of Women in U.S. State Prisons*. Washington, DC: Human Rights Watch, 1996. Cites interview with Rilea Schaefferman Mallet, The Correctional Association of New York, 30 January 1996.)

<sup>21</sup> Diaz-Cotto details the seeming paradox of women prisoners and the DOC's reaction to their transgression of societal expectations in her section on Bedford Hills Correctional Facility in *Gender, Ethnicity and the State*.

#### *Medical Care*

<sup>1</sup> Boudouris, James. PhD. *Parents in Prison: Addressing the Needs of Families*. Lanham, MD: American Correctional Association, 1996. 11.

<sup>2</sup> "Inside the Women's Prisons of California." *Revolutionary Worker* #911. 15 June 1997. <<http://www.fxot.org/rev/910-19911/prison.htm>>. Cites Ellen Barry's paper "Women Prisoners and Health Care: Locked Up and Locked Out."

<sup>3</sup> Pollock-Byrne, Joycelyn. *Women, Prison and Crime*. Pacific Grove, CA: Brooks/Cole Publishing Co., 1990. 147-152.

<sup>4</sup> In 1976, in *Estelle v. Gamble*, the Supreme Court ruled that deliberate indifference to serious medical needs violates the Eighth Amendment. Despite this ruling, prison health care continues to neglect and even jeopardize the health of both its male and female inmates.

<sup>5</sup> Penn, Dan. "Bag'm, Tag'm and Bury'm: Wisconsin Prisoners Dying for Health Care." *Prison Legal News*, volume 12, #2, February 2001. 1-2.



1996: 318.) Despite the fact that these women employed tactics similar to those of their male counterparts, these acts of organizing and resistance are relegated to the footnotes.

When I began this research, I asked the former president of a male prisoner organization, a member of the Missouri Prison Labor Union and an anarchist prisoner what they knew about women prisoners. Their responses confirmed that male prisoners, even those struggling against the prison-industrial complex, remain virtually unaware of their female counterparts and the issues confronting them.

<sup>4</sup> Letter from Barrilee Bannister, postmarked 2 February 2001.

<sup>5</sup> Morash, Merry; Bynum, Timothy S.; Koons, Barbara A. "Women Offenders: Programming Needs and Promising Approaches." U.S. Department of Justice, National Institute of Justice: Research in Brief, August 1998. 1.

<sup>6</sup> *Ibid.* 10.

<sup>7</sup> Owen, Barbara. "In the Mix": *Struggle and Survival in a Women's Prison*. Albany: State University of New York Press, 1998. 164.

<sup>8</sup> Richie, Beth E.; Tsenin, Kay; Widom, Cathy; Spatz. "Female Offenders, Pornography and Prostitution: Child Abuse and Neglect." U.S. Department of Justice Research Forum: Research on Women and Girls in the Justice System, Volume 3, 1999.

<sup>9</sup> Faith, Karlene. "The Politics of Confinement and Resistance: The Imprisonment of Women." *Criminal Injustice: Confronting the Prison Crisis*. Elihu Rosenblatt, ed. South End Press, 1998. 168.

<sup>10</sup> Radical scholar Nancy Kurshan, in acknowledging the lack of documentation around women prisoners' activism, argues, "We do not believe that is because resistance does not occur, but rather because those in charge of documenting history have a stake in burying this herstory. Such a herstory would challenge the patriarchal ideology that insists that women are, by nature, passive and docile." She then cites instances of resistance and rebellion in women's prisons from the Civil War period to the 1970s.

<sup>11</sup> Diaz-Cotto, Juanita. *Gender, Ethnicity, and the State: Latina and Latino Prison Politics*. Albany, NY: State University of New York Press, 1996. 324-5.

<sup>12</sup> Faith, Karlene. *Unruly Women: The Politics and Confinement of Resistance*. Vancouver: Press Gang Publishers, 1993. 235.

<sup>13</sup> Diaz-Cotto, xiv.

<sup>14</sup> *Ibid.* 5.

differences and thus accord them the same, if not worse, treatment as their male counterparts.

### Medical Care

One pressing issue for women prisoners is the lack of or poor medical care they receive. While all prisoners face poor medical care, prison administrations often ignore or neglect the particular health care needs of women prisoners. Even prison wardens agree that several of the particular needs of pregnant women "have yet to be dealt with in any of the facilities," including adequate resources to deal with false labors, premature births and miscarriages; lack of maternity clothing; the requirement that pregnant inmates wear belly chains when transported to the hospital; and the lack of a separate area for mother and baby.<sup>1</sup> Pregnant women are also not provided with the proper diets or vitamin supplements or given the opportunity to exercise. The director of Legal Services for Prisoners with Children, Ellen Barry, accused the prison system of a "shocking disregard of basic humanity that I saw reflected in the type of treatment to which pregnant women were subjected." One horrifying example is that of a twenty-year-old woman who was almost five months pregnant when incarcerated. Soon after, she began experiencing vaginal bleeding, cramping and severe pain. She requested medical assistance numerous times over a three-week period, but there was no obstetrician on contract with the prison. She was finally seen by the chief medical officer, an orthopedist, who diagnosed her without examining her physically or running any laboratory tests, and given Flagyl, a drug that can induce labor. The next day, the woman went into labor. Her son lived approximately two hours.<sup>2</sup>

In addition to medical ignorance/neglect of the prison medical staff, women who have given birth are not only immediately separated from their newborns, but, in the name of security, are sometimes subjected to vaginal exams despite the risk of infection.<sup>3</sup>

Not only are the particular health care needs of women ignored or dismissed, but health care in general is often inadequate or life-threatening.<sup>4</sup> In February 2000, Wisconsin prisoner Michelle Greer suffered an asthma attack and asked to go to the Health Services Unit (HSU). When the guard and captain on duty contacted the nurse in



charge, he did not look at Greer's medical file, simply instructing her to use her inhaler (which was not working). Half an hour later, Greer's second request to go to HSU was also ignored. After another half hour, Greer was told to walk to HSU but collapsed en route. When the nurse in charge arrived, it was without a medical emergency box or oxygen. A second nurse arrived with the needed emergency box, but again with no oxygen. Forty-five minutes after her collapse (and less than two hours after her initial plea for medical help), Greer died.<sup>5</sup>

However, women have been active about trying to change their sometimes life-threatening medical neglect. The most successful and well-known prisoner-initiated project organized around health care is the AIDS Counseling and Education Project (ACE) at Bedford Hills. AIDS is the leading cause of death among U.S. prisoners, being five to ten times more prevalent in prison than in the outside society.<sup>6</sup> In 1994, the New York State Department of Health found that the rate of HIV infection among women entering the New York State Correctional Facilities was nearly twice that of their male counterparts.<sup>7</sup> In 1987, women at the maximum-security Bedford Hills Correctional Facility in New York, motivated by watching their friends die of AIDS and by the social ostracism and fear of people with AIDS, started ACE.<sup>8</sup>

ACE founders hoped to educate and counsel their fellow inmates about HIV/AIDS as well as help to care for women with AIDS in the prison infirmary. While the prison superintendent, Elaine Lord, gave the group permission for the project, ACE continually faced staff harassment and administrative interference. For instance, because both Kathy Boudin and Judith Clark, alleged members of the Weather Underground, were active ACE members, the group was constantly monitored and sometimes prevented from officially meeting. The fear that the one-to-one peer counseling sessions would lead to inmate organizing and the staff's own ignorance and fear of HIV/AIDS led to staff harassment and interference. Educators from the Montefiore Hospital holding training sessions were banned from the facility for suggesting that the Department of Correctional Services lift its ban on dental dams and condoms.<sup>9</sup> A year after its formation, ACE members were prohibited from meeting at its regular time, to use its meeting room, give educational presentations or to refer to themselves as "counselors."<sup>10</sup>

Women prisoners are seen through the same lens as the feminists of the 1960s and 1970s were: both groups are seen as violating the accepted societal bounds of femininity and are thus subject to dismissal, if not ridicule, punishment and misrepresentation. Women prisoners are further marginalized and overlooked by mainstream society because of their relative invisibility and the pervading assumption of all prisoners as dangerous criminals. While the feminists of the 1960s and 1970s were able to gain some attention to their demands through demonstrations and rallies, women prisoners must rely on sympathetic outside supporters to draw public attention to their issues. With the current hysteria about crime and punishment, this is no easy task for the relatively few outside groups with both the desire and the resources to support women in prison.

However, this does not mean that women in prison passively accept their conditions. Women inmates have both individually and collectively struggled to improve their health care, abolish sexual abuse, maintain contact with their children and further their education. Such actions are often ignored or dismissed by those studying the prison-industrial complex, prisoner rights activists and outside feminists, making documentation and research all the more important in giving women inmates a voice in the discourse.

## Notes

### Introduction

<sup>1</sup> Greenfield, Lawrence A. and Snell, Tracy L. "Women Offenders." U.S. Department of Justice, Bureau of Justice Statistics, Special Report, December 1999, revised October 2000. 6.

<sup>2</sup> Faith, Karlene. "The Santa Cruz Women's Prison Project, 1972-1976." *Schooling in a Total Institution*. 174. For example, between 1969 and 1973, there were four "disturbances" at a women's prison in Milledgeville, Georgia. In 1973, ninety percent of the prisoners at the California Institution for Women in Clinton, New Jersey, organized a three-day work stoppage to protest the facility's poor mail distribution, food and medical care. In 1974, inmates at the North Carolina Women's Prison in Raleigh held five days of protest about the facility's poor medical and counseling services and demanded the closing of the prison laundry. (See Juanita Diaz-Cotto's *Gender, Ethnicity, and the State: Latina and Latino Prison Politics*. Albany, NY: State University of New York Press,



disciplinary ticket for "Insolence Towards a Staff Member." When she appealed the ticket, the administration denied that her circumstances justified her outburst.<sup>11</sup> This administrative attitude reflects the larger public dehumanization of women in prison.

Strothers' treatment is an indication of the hostility towards women prisoners who complain. As late as 1995, the Michigan Department of Corrections policy allowed an employee to participate in investigating a grievance against him or her. The accused employee often made the response to the complaint as well.<sup>12</sup> Although policy changes in 1995 removed the accused's participation in the investigation, the employee is still informed of the complainant's name and identification number at the outset of the investigation.<sup>13</sup> In Canon City, Colorado, the accused employee is still the one to address the inmate's formal grievances, making it <sup>inevitable</sup> ~~improbable~~ that the grievance will be denied. Dawn Amos observed that during her two years' incarceration, she has "never, ever seen anyone win a grievance."<sup>14</sup>

Those who file lawsuits are also subject to administrative retaliation. An inmate who participated in a recent class-action lawsuit in Canon City received two disciplinary tickets and was transferred to a prison in Denver. "That may not seem harsh to you or others," explains Dawn Amos, "but the women in here over time find security and stability, with friends, lovers, or their jobs and the fear of being uprooted and moved to another city really scares them."<sup>15</sup> Barrillec Bannister and the other women transferred to Florence are now viewed as "troublesome prisoners" and have "Security Threat Group" status.<sup>16</sup>

The most horrifying is the prison's unwillingness to jeopardize an inmate's health in retaliation for filing a lawsuit. Because she was the lead plaintiff in *Shumate v. Wilson*, a class-action lawsuit challenging the medical neglect and abuse in California prisons, Charisse Shumate only received the blood transfusions necessary for those with sickle-cell anemia once every three months.<sup>17</sup> That such practices are allowed to continue signifies the extent that prison authorities have kept public scrutiny, and thus outrage, from their walls and can therefore conduct daily operations as they see fit.

## Conclusion

Despite these setbacks, the members of ACE not only managed to implement and continue their program, but also received a grant for a quarter million dollars from the AIDS Institute and wrote and published a book as both an educational resource and a reference manual for other prison AIDS programs. One interesting aspect is that despite ACE's success, male prisoners attempting to set up similar programs at their facilities continue to meet with administrative resistance and retaliation.

Other women political prisoners have also focused on the AIDS crisis behind bars. Marilyn Buck, for example, started an AIDS education and prevention program in California.<sup>18</sup> However, with the exception of ACE at Bedford Hills, researchers and scholars have either largely ignored these programs or overlooked the difficulties and administrative harassment faced by those organizing around HIV/AIDS issues in prison.

Women have also worked individually and without the auspices of administrative approval to change their health care. Until her recent death, Charisse Shumate worked with her fellow inmates with sickle-cell anemia to understand the disease and the necessary treatments.<sup>19</sup> She also advocated the right to compassionate release for any prisoner with less than a year to live. Unfortunately, Shumate herself died at CCWF, away from family and friends, because the Board of Prison Terms recommended clemency rather than compassionate release. Governor Gray Davis refused to approve the Board's recommendation.<sup>20</sup>

Just as scholars and researchers have ignored women's organizing around HIV/AIDS, they have also ignored the struggles of individual women for adequate health services and support. The works of ACE, Marilyn Buck and Charisse Shumate may not be as dramatic as a work strike or a boycott, but they nonetheless address crucial issues facing women in prison.

## Children

Separation from children is another major issue for women inmates. In 1998, more than a quarter million children under the age of eighteen had a mother behind bars.<sup>21</sup> When a 1990 American Correctional Association survey asked women prisoners to name



the most important person[s] in your life." fifty-two percent identified their children.<sup>2</sup> These numbers should warrant that *all* women's prisons have family and parenting programs available. However, such is not the case. Inmate mothers, many of whom were single heads of household prior to incarceration, are left on their own to navigate the rocky path of maintaining contact and custody of their children. Faith argues that this lack is due to the idea that "no woman who has used drugs, worked as a prostitute or otherwise shown 'deviant' or criminal tendencies can be a 'good' mother."<sup>3</sup> Women prisoners are viewed as incapable of being good mothers and thus do not automatically deserve the same respect and treatment accorded to mothers on the outside. While this may be the case in some instances, such as drug-addicted mothers, such a sweeping generalization ignores the fact that many inmate mothers were single heads of household, the sole provider for their children and may have been forced to rely on illegal means to support their family. The view of the inmate mother as somehow unfit and unworthy has been used to legitimate prison and social services policies regarding the children of imprisoned parents. A 1978 directive of the Department of Social Services specified that it can refuse imprisoned parents visits with their children placed in foster care if it believes that visits will hurt the children.<sup>4</sup>

Maintaining family ties, however, is not an issue addressed by many of the male prisoner activists. In this way, prison and its inmates reflect the outside world and its expectations: women are expected to be the keepers of hearth and home and, when a mother is incarcerated, the burden to maintain ties to her children falls upon her. In 1998, over two-thirds of all women prisoners had children under the age of eighteen, and, among them, only twenty-five percent said that their children were living with the father. In contrast, ninety percent of male prisoners with children under the age of eighteen said that their children were living with their mothers.<sup>5</sup> A 1993 survey of women prisoners in eight states and Washington, DC, found that fifty-four percent of the inmate mothers interviewed were never visited by their children.<sup>6</sup> One major factor in this lack of visitation is distance: More than sixty percent of inmate mothers were incarcerated more than one hundred miles from their child's home. Less than nine percent were within twenty miles of their child.<sup>7</sup> However, the courts have reflected the opinion that inmate mothers have forfeited their rights to see their children. In 1987, *Pitts v. Meese*

begging for medical treatment, are ignored—and sometimes even disciplined for being 'aggressive' or 'disruptive.'"<sup>8</sup> Their findings led to a series of articles about the inadequate and often times life-threatening medical care in Wisconsin prisons, prompting the state's lawmakers to introduce legislation requiring better-trained medical staff, improved medical record-keeping, and the creation of an independent panel of outside medical experts to review prison deaths.<sup>9</sup>

Had that one phone call not been made, the deaths of Greer and other Wisconsin inmates, both male and female, would have remained swept under the rug. This anonymous woman prisoner protested the conditions of the prison-industrial complex in a similar way as male inmates like Shcurwood and Fleming—by gaining media exposure to the issue. However, because she refused to identify herself, her contribution to the struggle against the prison-industrial complex remains neglected by scholars in favor of the more vocal and visible forms of resistance.

Although prisoners can file grievances against abuse and neglect by the prison administration, many have become disillusioned and/or fearful of this process. One woman prisoner interviewed by Human Rights Watch stated that the corrections officers "will tear it up and throw it in the garbage...or [they] will say, 'Go ahead and 602 me because I know it won't go nowhere.' Most 602s get thrown in the garbage before you go away. It's a joke to them." In California and many other states, any prisoner filing a grievance for sexual abuse must first speak to the perpetrator.<sup>10</sup> Who knows how many women have been intimidated into inaction by this outrageous requirement?

If the inmate does face the perpetrator and if her grievance does not go into the garbage, she also faces a largely unsympathetic review board which values the word of a staff member more than that of a prisoner. According to a former counselor at a Georgia prison, officials expect impunity for their actions because of the prevailing belief that "inmates are criminals...their credibility is going to be in question from the very beginning."<sup>11</sup> Too, there is often the belief that the inmate does not merit humane treatment simply because she is incarcerated: When Paula Strothers, a prisoner at a federal prison in Florida, was escorted naked through her housing unit, she told the (male) officer, "Fuck you and kiss my ass." For her outburst, she was written a



Gaining media attention goes hand in hand with filing lawsuits. Barrilee Bannister and the other 77 women transferred to Florence were removed from the abusive all-male prison only after their plight caught the media's attention. Prior to that, those who complained about the guards' sexual assaults were placed in segregation units, had good time taken away and were sometimes monetarily fined while their attackers suffered no consequences.<sup>7</sup> In Washington, what appears to be "consensual sex between an inmate and a prison employee is not explicitly outlawed. Only after Wells' case was made front-page news did the state's legislators propose banning all prison sex. However, three years later, no such law has gone into effect." In Michigan, lawmakers began to consider harsher penalties against Corrections Department workers who have "sexual contact" with an inmate only after prisoner lawsuits drew embarrassing publicity to the state. The power of the media became evident when, in 1999, national television journalist Geraldo Rivera's report on official sexual misconduct in prison was cited several times during a House debate about prison-related legislation.<sup>8</sup> But while prison abuse remains behind closed doors and out of the public eye, policymakers, legislators and the courts remain reluctant to interfere in the daily operations and conditions of prisons.

Another example of the power of the media occurred this past year. An anonymous female prisoner telephoned the *Milwaukee Journal Sentinel* to report the medical neglect leading to Michelle Greer's death. This one phone call prompted *Sentinel* reporter Mary Zahn to begin investigating. Two weeks after Greer's unnecessary death, she not only publicized the story, but turned the death into a "minor sensation." The publicity led the Wisconsin Department of Corrections to investigate the incident and suspend the two nurses who initially ignored Greer's requests for medical assistance and then bungled their eventual response, leaving her to die. The article also prompted the state's Assembly's Corrections and Courts Committee to hold investigative hearings into the incident.<sup>9</sup>

This one story led to the paper's own investigation as to whether the neglect causing Greer's death was an isolated incident. For the following eight months, Zahn and a fellow journalist Jessica McBride investigated every prisoner death since 1994, revealing "a dysfunctional health care system in which gravely ill prisoners, often while literally

determined that prisoners have no right to be in any particular facility and may be transferred both within and out of state according to the institution's needs.<sup>8</sup> Such a decision gives prison authorities the power to effectively sever a woman's ability to see her child. Not only the distance, but the travel time and expenses make frequent visits less likely. For instance, while Barrilee Bannister is imprisoned in Pendleton, Oregon, her eight-year-old daughter lives with Bannister's relatives in Groversville, New York.<sup>9</sup> "I'm lucky to see them every six or eight months," writes Bannister. However, Bannister still retains full custody of her daughter, a rarity among inmate mothers.<sup>10</sup> This distancing of women from their families is often used, thus effectively weakening, if not severing, a woman's ties from her loved ones. Maintaining parental ties has not been won through prisoner boycotts, work stoppages or hunger strikes, tools traditionally used by male inmates to challenge their conditions.<sup>11</sup> Rather, those women who want family maintenance programs must work with their prison administrations, a far less glamorous path for researchers and activist academics.

One example of such a program is the Children's Center at the Bedford Hills Correctional Facility in New York. The Center houses a nursery where inmates and their babies are allowed to live together for the child's first year as well as a program helping the new inmate parents "learn to be mothers." Although it is staffed by inmates, the Center is administered by the Brooklyn Diocese of Catholic Charities and funded by the state's Department of Correctional Services.<sup>12</sup> However, under the Center's auspices, inmates, realizing the need for supportive programs for mothers, organized two parenting courses for Bedford's inmates—one on infancy for new mothers and pregnant prisoners and the other a ten-week course called "Parenting Through Films," with each week devoted to a new subject on growth and care for children.<sup>13</sup> These were the prison's first courses both organized and taught exclusively by inmates. Out of the Children's Center also came more far-reaching change. Until 1983, children of prisoners placed in the New York State foster care system did not have the legal right to visit their parents in prison. Inmates at Bedford Hills who had been unable to have their children visit them because of this formed the Foster Care Committee which, with the help of outside advocates, led to new legislation not only giving prisoners with children in foster care the same rights



and responsibilities as parents who are not incarcerated but also the right to monthly visits provided that the prison was not too far away.<sup>14</sup>

In addition, inmates involved in the Children's Center published a foster care handbook for women prisoners whose children had been placed in the foster care system.<sup>15</sup>

The success of the Children's Center did not go unnoticed by the more reform-oriented penal authorities: Modeled on the Children's Center, the Taconic Correctional Facility opened in 1990 with twenty-three inmate mothers.<sup>16</sup>

The Children's Center and its programs are less flashy, albeit very substantive, and the fact that it was founded by an outside religious figure with the approval of the Department of Corrections makes it less appealing for radical and leftist researchers and writers, seeking the more striking images of work stoppages, hunger strikes and more visual forms of protest.<sup>17</sup> This lack of appeal can be generalized to the overall issue of mothers behind bars.<sup>18</sup>

That prisoners strive to maintain contact with their children and other family members can also be a reason not to do anything which would have them labeled as "troublemakers" or "rabblers." "They [the prison staff and administration] would attack people [advocating for reform] through their emotions," stated one inmate at Bedford Hills: "Like the family would come in to visit somebody and they wouldn't find the inmate's chart and tell the family they weren't there and turn the family away at the gate."<sup>19</sup> Another inmate claimed that prisoners who publicly criticize the Bedford Hills personnel were often denied entry into the facility's Family Reunion Program.<sup>20</sup> Women inmates impregnated by prison staff may also be denied participation in the nursery program solely because of the father's status. Human Rights Watch found that two of the women they interviewed who had been sexually assaulted and impregnated by prison staff were denied entry.<sup>21</sup> Thus, an inmate's desire to spend (more) time with her child(ren) can also be used to dissuade her from organizing for change.

Women who give birth while incarcerated not only face the trauma of immediate separation from their newborns but also administrative and social service pressure to relinquish their new child.

to participate in either the college or pre-college program.<sup>4</sup> This fact alone should disprove the unspoken notion that education is not an issue for incarcerated women.

Professor Michelle Fine, with the aid of eight Bedford inmates, conducted interviews with College Bound participants, their children and correctional staff. While her study focused on the effect of education on recidivism, her findings demonstrated the importance of the opportunity to receive a college education both on the individual inmate and her surroundings.

Fine's interviews with the children of Bedford's inmates revealed that, ironically, "prison has become a place for intellectual, emotional and social growth....A space free of violence, drug and overwhelming responsibilities, a space which nurtures a kind of growth and maturity that would perhaps not have been realized on the outside."<sup>5</sup> While Fine does not delve deeply into this issue, it does suggest that women often are unable to focus on learning with the myriad of responsibilities and distractions of the outside world.

Other women have found ways to circumvent the 1994 Violent Crime Control and Law Enforcement Act's prohibition of federal financing of prisoners' education. Dawn Amos, for example, applied for and was awarded scholarships for college courses despite her status as a prisoner.<sup>6</sup>

#### *Grievances, Lawsuits and the Power of the Media*

Women's struggles to change their conditions often lie in filing grievances and lawsuits rather than physically challenging or confronting prison officials. In 1995, women at Central California Women's Facility at Chowchilla and at the California Institution for Women at Frazier filed a suit against the state demanding an immediate improvement to the life-threatening medical care given to all women prisoners of the state.<sup>7</sup> On 27 March 1996, seven women prisoners in Michigan filed a class-action lawsuit on behalf of all women incarcerated in Michigan, charging the state's Department of Corrections with sexual assault, sexual harassment, violations of privacy, and physical threats and assaults.<sup>8</sup> That both suits included women prisoners throughout their respective states in their charges and demands dismisses the assumption that there is no sense of solidarity among the relatively few women prisoners.



services outside the reach of the prison administration. This absence of a support network not only mirrors but magnifies the general lack of support for rape victims.

### Education

While women prisoners face issues not pertinent to male prisoners, they also share issues. However, these similarities are often neglected. One issue commonly overlooked when defining the issues of women prisoners is education. Studies of the impact of education have traditionally focused on male inmates. While education is not a particularly masculine concern, the omission of women in these studies indicates that researchers do not perceive this as an important issue for women.<sup>1</sup>

However, such is not the case. In the 1970s, inmates participating in the Santa Cruz Women's Prison Project, the first program to ever offer university courses in a women's prison, demonstrated their eagerness for higher education. In 1972, when Karlene Faith, one of its teachers and coordinators, was temporarily banned from the prison, inmates organized a work strike and a sit-in before the warden's office. Similarly, when the project was barred in 1973, the students circulated petitions, held work strikes and met with the administration to protest the project's removal.<sup>1</sup>

In 1981, the administration at Bedford Hills finally agreed to observe Powell v. Ward and set up a \$125,000 "settlement fund" to be spent by the *prisoners* for improvements at the prison.<sup>2</sup> Inmates spent all of this fund on educational tools: expansion of the library collection, books on African-American history, the hiring of an educational consultant, computers for business classes, and Spanish vocational classes.<sup>3</sup> That the inmates chose to spend exclusively on books and other educational materials shows that women, like men, are often eager to learn.

More than a decade later, when the cuts in federal and state funding ended prison college programs, the inmates at Bedford Hills worked with the prison administration and representatives from various colleges and universities throughout New York State to restore higher education programs. In 1996, they succeeded in implementing College Bound, an undergraduate college program aimed toward a Bachelor of Arts in Sociology. Nearly thirty-three percent of Bedford's inmates pay the equivalent of one month's wages

The case of Kebby Warner, a pregnant woman imprisoned for a bad check, illustrates the institutional belief that inmates cannot and should not retain custody, or even contact, with their children.

Warner, after having been misdiagnosed as having a stomach flu during her first month in prison, was informed that she was pregnant. Luckily, Warner's parents agreed to take care of the baby while she was incarcerated. After the birth of Helen, Warner refused to passively accept the prison requirement that separates mother and newborn after only one day: she refused to eat and thus won two more days in the hospital with her child. When the guards finally managed to separate them and bring her back to prison, she was told that if she had wanted to have children, she should have stayed out of prison. This one remark sums up the prevailing view of inmate mothers.

Although her parents had custody of her daughter, the pain and stress of separation still weighed upon her mind, leading to anger and fights with other inmates, disciplinary tickets and "the reputation of defiance," which resulted in a denial of parole. With the death of her father, however, came another loss: her mother, unwilling to care for a half-black baby alone, gave Helen to the foster care system.

The law allows for the termination of parental rights after two years. In Warner's case, this was certainly true. When her daughter was two years old, a judge terminated Warner's parental rights. When she started to appeal this decision, her caseworker and the Family Independence Agency threatened to place Helen with a new foster family who would adopt her immediately, thus permanently sealing her file and preventing Warner from ever being able to find her. Under this pressure, Warner finally signed an affidavit relinquishing her rights as a parent.

However, this loss inspired Warner to action against the prison-industrial complex's policy of breaking up families: she is currently forming a support organization for incarcerated parents. The organization she envisions "will stand at the courthouse and protest the kidnapping of a child that deserves to know who her mother/father is."<sup>22</sup> Thus, although the prison-industrial complex negatively impacts families and severs

family, ties in an attempt to break the individual inmate, women both collectively and individually resist such efforts.

### *Sexual Abuse*

A far greater problem for women prisoners than male prisoners is the sexual aggression of male corrections officers. In 1996, international human rights group Human Rights Watch released a report documenting sexual abuse of women prisoners throughout the United States. In 1994, the U.S. Department of Justice launched an investigation of two women's prisons in Michigan and found that "nearly every woman... interviewed reported various sexually aggressive acts of guards."<sup>1</sup> These instances included not only rape and sexual assault, but the mistreatment of prisoners impregnated by guards, abusive pat frisks and other body searches and violations of privacy, including searches of the toilet and shower areas and surveillance during medical appointments. One pregnant inmate was escorted by two male officers while in labor. The two men handcuffed her to the bed in the delivery room and then positioned themselves where they could view her genital area and make derogatory comments throughout her delivery.<sup>2</sup>

The case of Heather Wells, an inmate at Washington Corrections Center for Women, illustrates not only the prevalence of sexual assault but also the prison system's treatment of mothers. In December 1996, Wells was raped and impregnated by a guard in the prison laundry room. She charged the guard with rape but, even after a paternity test proved her claim, the state of Washington did not file charges. Instead, the guard was allowed to quit his job and move out of state. Only weeks after the baby was born, she was taken from Wells and placed in a foster home.<sup>3</sup> This callousness in separating a mother and her newborn infant is commonplace in most women's prisons, reflecting the attitude that incarcerated women have forfeited their rights (and feelings) as mothers.<sup>4</sup>

Unlike the sexual predation in male prisons, the perpetrators in female facilities are usually those in a position of authority, such as guards and other prison staff. This makes it impossible for women prisoners to form protective groups like their male counterparts. Guards hold the keys to their cells and are authorized to watch inmates,

conduct full-body frisks and strip searches, and enter cells at any time. Thus, the direct approaches of male groups such as the Angola Three or Gay Men Against Sexism, male inmate groups which bypass the administration by physically protecting weaker prisoners from sexual predators, do not work for women who wish to stop the sexual harassment and rape in their facility.

In the case of Barriette Bannister, sentenced under Oregon's mandatory sentencing law, she and seventy-eight other women were sent to a privatized, all-male prison in Arizona run by the Corrections Corporation of America (CCA). Not only were they separated from family and friends, but from any outside support which could have prevented their sexual abuse. Only weeks after the women's arrival, some were visited by a captain, who shared marijuana with them. He left it with them and then returned with other officers who announced that they were searching the cell for contraband. However, they promised that if the women performed a strip tease, they would not search the cell. "Two of the girls started stripping and the rest of us got pulled into it," Bannister recalled. "From that day on, the officers would bring marijuana in, or other stuff we were not suppose[d] to have, and the prisoners would perform [strip] dances." From there, the guards became more aggressive, raping several of the women. Bannister reported that she was not given food for four days until she agreed to perform oral sex on a guard.<sup>5</sup>

Once out of segregation, Bannister called outside friends and told them her story. They, in turn, informed the media. The media attention led to the return of some of the women to Oregon, where they filed a federal suit, resulting in a public apology, a promise of stricter rules concerning sexual abuse, and the reimbursement of attorney's fees.<sup>6</sup> The negative publicity also led to the suspension and dismissal of three dozen CCA staff members.<sup>7</sup>

Bannister's story is unusual only in that the women themselves were able to organize and obtain sufficient outside support to stop their abuse. Women inmates who have been assaulted by prison staff usually lack the outside support services which male prisoners may turn to. For instance, male inmates raped by other inmates can turn to outside groups such as Stop Prisoner Rape (started by an ex-inmate who was himself raped in prison). Women raped by prison staff, on the other hand, face not only administrative harassment and retaliation for complaining but also a lack of support